

Protass Law PLLC

260 Madison Avenue  
22nd Floor  
New York, NY 10016

T: 212-455-0335  
F: 646-607-0760  
hprotass@protasslaw.com

February 16, 2023

VIA ECF

Honorable Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. William McFarland, Case No. 17-CR-600 (NRB)

Dear Judge Buchwald:

This firm represents William McFarland in connection with service of his three-year term of supervised release. Per the call I received yesterday from Your Honor's law clerk, I write to provide the Court with additional information about Mr. McFarland's proposed travel to speak at "The Founder Summit 2023 by Entrepreneur University" in Wiesbaden, Germany on April 15-16, 2023, as described in my February 14, 2023 letter to this Court (Docket No. 101) seeking a modification to the terms of Mr. McFarland's supervised release for purposes of such travel. Initially, as detailed in my February 14, 2023 letter, U.S. Probation Officer Dwight Brown (who is responsible for Mr. McFarland's supervision) knows the details of Mr. McFarland's proposed travel and has no objection to Mr. McFarland's proposed travel.

As detailed in the attached written invitation (Exhibit 1), Robin Söder, the CEO of the Entrepreneur University & Founder Summit, has invited Mr. McFarland to speak at its "non-profit educational conference, The Founder Summit, on the topic of entrepreneurship" because she "believe[s] that [Mr. McFarland's] unique business insights and experiences as an entrepreneur and founder would greatly benefit [its] audience and add valuable insights to the conversation." The Founder Summit conference will be held on April 15-16, 2023 at the RheinMain Congress Center, Friedrich-Ebert-Allee 1, 65185 Wiesbaden, Germany. The Entrepreneur University intends to pay Mr. McFarland a speaker's fee of €17,700, which, at today's euro-dollar exchange rate, equals approximately \$18,920. Mr. McFarland intends to pay 10% of the speakers fee he earns towards satisfaction of his restitution obligation (just as he has been paying 10% of his gross monthly income towards satisfaction of his restitution obligation since he began serving his term of supervised release on August 30, 2022) even though he must pay for his own flight and hotel out of the speakers fee he will be paid. The actual amount of Mr. McFarland's restitution payment will, of course, depend on the euro-dollar exchange rate when

his is paid his speakers fee. Also, again, Mr. McFarland seeks permission to travel to Germany now because the conference organizers need confirmation of his participation in advance so that they can plan and publicize the conference to potential conference attendees.

I hope the foregoing information satisfies the Court's request for additional information concerning Mr. McFarland's proposed travel. Also, I have spoken with Assistant United States Attorney Alexandra Messiter, who advised me that the government will submit a separate letter when it has determined its position on Mr. McFarland's proposed travel as detailed herein and my February 14, 2023 letter to this Court.

Please let me know if the Court requires any further information or has any further questions about Mr. McFarland's proposed travel.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/

Harlan Protass

Encl.

cc: Alexandra Messiter, Esq. (via ECF)  
Assistant United States Attorney

Dwight Brown (via e-mail)  
U.S. Probation Officer